

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) ANDRE TAYLOR, a/k/a "Dre"  
[DOB: 04/05/1966]

(2) HARLAN TAYLOR, a/k/a "Bub"  
[DOB: 08/29/1961]

(3) RAYMOND TAYLOR, a/k/a "Ray"  
[DOB: 12/31/1977]

(4) DARRYL TAYLOR, a/k/a "  
"Cash Image" and "Cash"  
[DOB: 03/11/1978]

(5) CARL TAYLOR, a/k/a "Biggs"  
[DOB: 05/18/1979]

(6) ROBERT TAYLOR, a/k/a "R"  
[DOB: 08/16/1980]

(7) DANIEL HOWARD,  
[DOB: 08/02/1973]

(8) MARLON M. MINTON, a/k/a "M"  
[DOB: 11/07/1972]

(9) TYRONE ROCK,  
[DOB: 02/22/1972]

(10) ALLEN SANCHEZ a/k/a/ "Homey"  
[DOB: 02/26/1988]

No. 12-00291-01/16-CR-W-GAF

**COUNT ONE: Defendants 1-14 only**  
*Conspiracy to distribute powder cocaine,  
marijuana*

21 U.S.C. §§ 841(a)(1), (b)(1)(A) and 846  
NLT 10 Years, NMT Life Imprisonment  
NMT \$10,000,000 Fine  
NLT 5 Years Supervised Release  
Class A Felony

**COUNTS TWO, THREE, FOUR and  
SEVEN: D. Howard and Ray Taylor**  
*Distribution of powder cocaine*

21 U.S.C. §§ 841(a)(1) and (b)(1)(C)  
NMT 20 Years Imprisonment  
NMT \$1,000,000 Fine  
NLT 3 Years Supervised Release  
Class C Felony

**COUNTS FIVE and SIX: D. Howard, A.  
Taylor and Ray Taylor**  
*Aiding and Abetting distribution of  
powder cocaine*

21 U.S.C. §§ 841(a)(1), (b)(1)(C)  
NMT 20 Years Imprisonment  
NMT \$1,000,000 Fine  
NLT 3 Years Supervised Release  
Class C Felony

**COUNT EIGHT: A. Taylor, K. Cooper  
and E. Union**  
*Conspiracy to commit Murder for Hire*

18 U.S.C. §§ 1958  
NMT 10 Years Imprisonment  
NMT \$250,000 Fine  
NLT 3 Years Supervised Release  
Class C Felony

(11) RICK SHOEN a/k/a “Steve” or  
“White Guy”  
[DOB: 02/07/1962]

(12) RUBEN MACHICHE  
[DOB: 04/12/1960]

(13) GREGORY JOHNSON a/k/a “G”  
[DOB: 08/02/1978]

(14) BRYANT WILLIS a/k/a “Spaghetti”  
[DOB: 10/27/1979]

(15) KENNETH VAUGHN COOPER  
[DOB: 10/31/1982]

(16) ERIC UNION a/k/a “E”  
[DOB: 09/13/1983]

**Defendants.**

**COUNT NINE: A. Taylor and K. Cooper**  
***Possessing machinegun in furtherance of***  
***a crime of violence***

18 U.S.C. §§ 924(c)(1)(B)(ii)

NLT 30 Years (consecutive)

NMT \$250,000.00 Fine

NMT: 5 Years Supervised Release

Class C Felony

**COUNT TEN: K. Cooper**

18 U.S.C. § 922(g)(3) and 924(a)(2)

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

**Allegation of Criminal Drug**

**Forfeiture:Andre Taylor only.**

21 U.S.C. § 853

\$100 Special Assessment for Counts One  
through Ten

Defendant	Name	Counts
1	ANDRE TAYLOR	1, 5 and 6, 8, 9, Forfeiture
2	HARLAN TAYLOR	1
3	RAYMOND TAYLOR	1, 6 and 7
4	DARRYL TAYLOR	1
5	CARL TAYLOR	1
6	ROBERT TAYLOR	1
7	DANIEL HOWARD	1, 2, 3, 4, and 5
8	MARLON MINTON	1
9	TYRONE ROCK	1
10	ALLEN SANCHEZ	1
11	RICK SCHOEN	1

12	RUBEN MACHICHE	1
13	GREGORY JOHNSON	1
14	BRYANT WILLIS	1
15	KENNETH VAUGH COOPER	8, 9, and 10
16	ERIC UNION	8

## **SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES THAT:

### **COUNT ONE**

That between February 1, 2010, and the date of this Superseding Indictment, said dates being approximate, in the Western District of Missouri and elsewhere, **ANDRE TAYLOR**, a/k/a “Dre,” **HARLAN TAYLOR**, a/k/a “Bub,” **RAYMOND TAYLOR**, a/k/a “Ray,” **DARRYL TAYLOR** a/k/a “Cash Image” “Cash,” **CARL TAYLOR** a/k/a “Biggs,” **ROBERT TAYLOR**, a/k/a “R,” **DANIEL HOWARD**, **MARLON MINTON**, a/k/a “M,” **TYRONE ROCK**, **ALLEN L. SANCHEZ** a/k/a “Homey,” **RICK SCHOEN** a/k/a “Steve” or “White Guy,” **RUBEN MACHICHE**, **GREGORY JOHNSON** a/k/a “G,” and **BRYANT WILLIS** a/k/a “Spaghetti,” defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other and others, both known and unknown to the Grand Jury, to distribute: (1) a thousand (1,000) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance; and (2) cocaine, a Schedule II controlled substance, in an amount of five (5) kilograms or more, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and 846.

### **COUNT TWO**

On or about July 21, 2011, within the Western District of Missouri, **DANIEL HOWARD**, a/k/a “Saw,” defendant herein, did knowingly and intentionally distribute a mixture

or substance containing an amount of powder cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### **COUNT THREE**

On or about November 9, 2011, within the Western District of Missouri, **DANIEL HOWARD**, defendant herein, did knowingly and intentionally distribute a mixture or substance containing an amount of powder cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### **COUNT FOUR**

On or about December 22, 2011, within the Western District of Missouri, **DANIEL HOWARD**, defendant herein, did knowingly and intentionally distribute a mixture or substance containing an amount of powder cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### **COUNT FIVE**

On or about January 5, 2012, within the Western District of Missouri, **ANDRE TAYLOR**, a/k/a “**Dre**,” and **DANIEL HOWARD**, defendants herein, aiding and abetting each other and others, did knowingly and intentionally distribute a mixture or substance containing an amount of powder cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

All in violation of Title 18, United States Code, Section 2.

### **COUNT SIX**

On or about January 25, 2012, within the Western District of Missouri, **ANDRE TAYLOR**, a/k/a “**Dre**,” and **RAY TAYLOR**, defendants herein, aiding and abetting each other and others, did knowingly and intentionally distribute a mixture or substance containing an

amount of powder cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

All in violation of Title 18, United States Code, Section 2.

#### **COUNT SEVEN**

On or about February 1, 2012, within the Western District of Missouri, **RAYMOND TAYLOR**, a/k/a "**Ray**," defendant herein, others did knowingly and intentionally distribute a mixture or substance containing an amount of powder cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

#### **COUNT EIGHT**

Between on or about August 14, 2012 and August 21, 2012, in the Western District of Missouri, and elsewhere, **ANDRE TAYLOR**, a/k/a "**Dre**," **KENNETH VAUGHN COOPER**, and **ERIC UNION** a/k/a "**E**," defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other and others, both known and unknown to the Grand Jury, to travel in interstate commerce from Kansas City, Kansas, to Kansas City, Missouri, with the intent that the murder of Billy Brown be committed, and did use a communication facility to discuss, plan, and arrange said murder, in violation of the laws of the state of Missouri, as consideration for the receipt of, and as consideration for a promise and agreement to pay, things of pecuniary value, to wit: \$10,000 in United States currency, contrary to the provisions of Title 18, United States Code, Section 1958.

#### **COUNT NINE**

On or about August 21, 2012, in the Western District of Missouri, **ANDRE TAYLOR** a/k/a "**Dre**," and **KENNETH VAUGHN COOPER**, defendants herein, in furtherance of a crime of violence, to wit: Conspiracy to Commit Murder for Hire, as alleged in Count Eight, did

knowingly and intentionally possess a firearm, to wit: a .45 ACP M10-type machinegun, as defined in Title 26 U.S.C. Section 5845(b) contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(B)(ii).

### **COUNT TEN**

On or about August 21, 2012, in the Western District of Missouri, **KENNETH VAUGHN COOPER**, defendant herein, being an unlawful user of, or addicted to a controlled substance, i.e. marijuana, as defined in Title 21, United States Code Section 802 did knowingly possess in and affecting commerce, ammunition, to wit: eight rounds of Federal, .45 caliber ammunition and 10 rounds of Winchester .45 caliber ammunition which had been transported in interstate commerce, contrary to the provision of Title 18, United States Code, Section 922(g)(3) and 924 (a)(2).

### **ALLEGATION OF FORFEITURE**

#### **ALLEGATION OF CRIMINAL DRUG FORFEITURE**

The allegations contained in Count One of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

Each defendant named herein shall forfeit to the United States all property, real and personal, constituting and derived from any proceeds said defendant obtained directly and indirectly as a result of the violation incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violation incorporated by reference in this Allegation, including but not limited to the following:

#### **1. REAL PROPERTY**

All lots or parcels of land, together with their buildings, appurtenances, improvements, fixtures, attachments and easements, at the addresses listed and described as follows:

- a. All of Lot 30 of Glen Oaks, a platted subdivision in Kansas City, Jackson County, Missouri. This tract of real property is commonly referred to as 13401 E. 54th Street, Kansas City, Missouri, 64133, and the owner of record is Shawnta Rushing.

It is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above-described forfeitable property.

All in violation of Title 21, United States Code, Section 853, and pursuant to Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRU E BILL.

Dated: 5/23/13

/s/ Timothy L. Pierce  
FOREPERSON OF THE GRAND JURY

/s/ Stefan C. Hughes  
Stefan C. Hughes #40239  
Assistant United States Attorney